

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

MADISEN ULRICH,

Plaintiff,

V.

319 BRAGG STUDENT HOUSING
AUBURN, AL, et al.,

Defendants.

Case No.: 3:20-cv-1018- RAH-SRW

319 BRAGG STUDENT HOUSING AUBURN, AL, LLC'S AND GREP SOUTHEAST, LLC'S ANSWER TO FIRST AMENDED COMPLAINT

COME NOW 319 BRAGG STUDENT HOUSING AUBURN, AL, LLC (“Bragg”) and GREP SOUTHEAST, LLC (“GREP”), who appear through the undersigned counsel, and for answer to Plaintiff, Madisen Ulrich’s First Amended Complaint, Bragg and GREP (hereinafter collectively referred to as “Defendants”) set down and assigns as follows:

**SPECIFIC RESPONSES TO NUMBERED PARAGRAPHS OF THE
FIRST AMENDED COMPLAINT**

1. Admitted that GREP was at the time of this accident the Property Manager for Bragg.
2. Admitted.
3. Denied that these Defendants committed any tortious conduct.
4. The allegations of this paragraph do not require a response.
5. Admitted that a collision occurred between Plaintiff and a CSX freight train on October 4, 2018 in Auburn, Alabama. The remainder of the allegations in this paragraph are denied.